



November 18, 2003

FILED as etext in Form 99 (filing ID FEC-00009) and sent by U.S. Mail

Antoinette Kitchen  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20005

Re: Service Employees International Union Political Action Committee  
(C00004036)  
Amended 30 Day Post-General Report 2002 (10/17/02 - 11/25/02),  
received 12/10/02

Dear Ms. Kitchen:

This is in further response to your information request dated May 14, 2003 concerning the above referenced report. As we have indicated in previous filings and correspondence, our computer software does not allow us to file amended reports for this period in the new format required. We have since switched to a new computer software program and are working on a technical solution that will allow us to file amended reports electronically in the new format. Until we can test and implement those changes, I am submitting this letter to answer your inquiry. If our current approach works, we expect to file an amended report for the period by the end of this month.

You requested a clarification of the expenditure described as "Poling P. Wellstone (Senate) MN" as reported on Schedule B for Line 29 at page 106 of the amended report filed 12/10/02. We have reviewed the transaction and believe that it was correctly reported as an Other Disbursement included on Line 29; it was not an in-kind expenditure for the candidate nor was it an independent expenditure "for a communication expressly advocating the election or defeat of a clearly identified candidate" (11 CFR 100.16(a)). The purpose reported on Schedule B should read "research about Minnesota Senate race" and will be amended when we are able to file an amended form for this period electronically.

You also inquired about the year-to-date totals reported in Column B for Lines 23 and 29. Our review has determined that the year-to-date amounts on these Lines are correct. The totals represent a shift of \$500 from Line 23 to Line 29 after the prior report was filed on 10/24/02. This shift was the result of correcting the \$500 contribution made to the Elect Underwood/Ada Committee. That contribution, made on 7/17/02 related to a

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